

FILED
Clerk
District Court

FEB 29 2008

For The Northern Mariana Islands
By _____
(Deputy Clerk)

TORRES BROTHERS, LLC
Joaquin DLG. Torres, Esq. (FO257)
Attorneys at Law
P.O. Box 501856
Saipan, MP 96950
Bank of Guam Building, Third Floor
Tel.: (670) 233-5504/6
Fax: (670) 233-5510
Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

INVICTUS T. FELICIANO,

Plaintiff,

v.

EASTERN HOPE CORPORATION,

Defendant.

Civil Action No. 08-0001

**ANSWER AND AFFIRMATIVE
DEFENSES**

COMES NOW, Defendant EASTERN HOPE CORPORATION, by and through its attorney Joaquin DLG. Torres, and hereby file this Answer and Affirmative Defenses. As such, Defendant answers the following accordingly:

1. As to Paragraphs 8, 10, 11, 13 and 14 of the complaint, Defendant ADMITS the allegations contained therein.
2. As to Paragraphs 1, 2, 3, 4, 5, 6, 9, 12, 15, 16, 17, 18, 20, 21, 22 and 23 of the complaint, Defendant DENIES the allegations contained therein.
3. As to Paragraph 7 of the complaint, Defendant admits that Defendant filed charges of discrimination with the Equal Employment Opportunity Commission ("EEOC") in Saipan, Commonwealth of the Northern Mariana Islands but denies the rest of the allegations contained therein.

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1 4. Paragraph 19 of the complaint does not illicit a response and on that basis Defendant denies
2 the same.

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4 AFFIRMATIVE DEFENSES:

- 5 1. Plaintiff's Complaint fails to state a claim upon which relief can be granted.
6 2. Plaintiff's Complaint is barred by the Doctrine of Waiver.
7 3. Plaintiff's Complaint is barred by the Doctrine of Estoppel.
8 4. Plaintiff's Complaint is barred by the Doctrine of Laches.
9 5. Plaintiff's Complaint is barred by the Doctrine of Unclean Hands.
10 6. Plaintiff's Complaint is barred or must be reduced by accord and satisfaction.

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12 WHEREFORE, Defendant **EASTERN HOPE CORPORATION** prays for relief as follows:

- 13
14 1. That Plaintiff take nothing by her Complaint.
15 2. For Costs and fees associated with this action; and
16 3. For other relief this Court deems appropriate.

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18 Respectfully Submitted on this 29 day of February, 2008.

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20 TORRES BROTHER, LLC.
Attorneys At Law

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23 JOAQUIN D.L.G. TORRES
24 Attorney for Eastern Hope Corporation